UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

ALEXANDRA MATALAVAGE,

Plaintiff,

vs.

20-CV-1254-WMS-LGF

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NOTICE OF MOTION TO MODIFY CASE MANAGEMENT ORDER

SHERIFF OF THE COUNTY OF NIAGARA, ET AL.,

Defendant.

PLEASE TAKE NOTICE, hereby given, that upon the Affirmation of Anna Marie Richmond, filed herewith, Plaintiff will move this Court, at a date and time to be set by the Court, for an Amendment to the most recent Case Management Order, Item No. 35, extending the deadlines set forth in ¶¶ 2, 4, 5, and 6 of the Order as follows:

All fact discovery shall conclude on October 31, 2022;

All motions to compel fact discovery shall be filed on or before September 27, 2022;

Dispositive motions, if any shall be filed no later than January 13, 2023;

Mediation sessions may continue until December 13, 2022;

Final pre-trial conference in the absence of dispositive motions to be scheduled at the Court 's discretion.

Please note that all extensions, except for the extension of the deadline for motions to compel fact discovery, are requested with the consent of Defendants' counsel, as is set forth in detail in the Attorney's affirmation filed herewith.

By: Anna Marie Richmond

Anna Marie Richmond, Esq.

By: <u>Elizabeth Tommaney</u> Elizabeth Tommaney, Esq.

Law Office of Anna Marie Richmond, Esq. 2500 Rand Building 14 Lafayette Square Buffalo, NY 14203 annamarierichmondesq@gmail.com

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Dated: Buffalo, New York

August 23, 2022

To: Michael E. Hickey, Esq., and Riane F. Lafferty Esq.,

Attorneys for the Defendants Bond, Schoeneck & King, PLLC 200 Delaware Avenue, Suite 900

Buffalo, NY 14202-2292\